

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO ALL CASES	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

STIPULATION OF AMENDMENT TO PROTECTIVE ORDER

This stipulation sets forth the agreement between Defendants Ethicon, Inc. and Johnson & Johnson (“Defendants”) and Plaintiffs regarding the use of documents produced in the above-captioned action.

1. Defendants stipulate that to further the purposes of efficiency and expediency, Plaintiffs’ counsel in the above-captioned litigation who are also counsel for Plaintiffs in the In re: Ethicon Physiomesh Flexible Composite Hernia Mesh Products Liability Litigation (“Physiomesh MDL”) are permitted to use the documents that were produced in this action by Defendants (“the Documents”) in the Physiomesh MDL.

2. The use of the Documents in the Physiomesh MDL shall not constitute a violation of Section II.B.6 of the Protective Order entered in this action.

3. Until a protective order is entered in the Physiomesh MDL, the use of the Documents in the Physiomesh MDL will be subject to the terms of the Protective Order entered in this action. Upon entry of a protective order in the Physiomesh MDL, the use of the Documents in the Physiomesh MDL will be subject to the terms of the protective order entered in the Physiomesh MDL.

